

April 6, 2012

Mr. David Richardson, Manager City of Camden, Water Utilities P.O. Drawer J Camden, AR 71711

AFIN: 52-00073 NPDES Permit No.: AR0022365

Dear Mr. Richardson:

On 3/14/2012, I performed a routine compliance inspection of the City of Camden, Water Utilities facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

- 1. The west clarifier was out of service at the time of the inspection. This is a violation of Part II.B.1a of the permit.
- 2. The east clarifier had an oil leak from the gear box which was causing an oil sheen on the clarifier. This is a violation of Part III.B.1a of the permit.
- 3. Best Management Practices (BMPs) as outlined in the facility's Storm Water Pollution Prevention Plan (SWPPP) were not being followed. Specifically, solid waste consisting of pallets, carpeting, and scrap were scattered behind the sludge plant. Excessive sludge tracking was also noted in sludge loading area. This is a violation of Part III.10.B7i of the permit.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Enforcement-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by April 19, 2012.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910

If I can be of any assistance, please contact me at 870-862-0680.

Sincerely,

John W. Lamb

District 8 Field Inspector

John W. Lamp

Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

ADEQ Water NPDES Insp	00223	022365								
≎ EPA						Form Approved OMB No. 2040-0003				
UN	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460									
NPDES										
		Section A: Nationa		_ _						
Transaction Code NPDES Yr/Mo/Day Inspec. Type Inspector Fac. Type 1 N 2 5 3 A R 0 0 2 2 3 6 5 11 12 1 2 0 3 1 4 17 18 C 19 S 20 1										
			marks							
Inspection Work Days 67 69	Facility Evaluation R 70 3	Ĭ	ı ì	N 73 74 75		Reserved				
		Section B:	Facility D)ata						
Name and Location of Facility Inspected (F include POTW name and NPDES permit nu City of Camden, Water Utilities		charging to POTW,	also	Entry Time/Date 8:56 /3/14/2012		Permit Effective Date 11/1/2007				
101 Ouachita 197 Camden, AR		Permit Expiration Date 10/31/2012								
Name(s) of On-Site Representative(s)/Title(Keith Ballard, Plant Superintendent/870-		er Facility Data								
Name, Address of Responsible Official/Title/Phone and Fax Number David Richardson, Manager, 870-836-5190 City of Camden, Water Utilities P.O. Drawer J Camden, AR 71711 PDS #064938 Contacted Yes No										
		tion C: Areas Eval		ring Inspection factory, N = Not Evaluated)						
S Permit S	1	· ·	**	rations & Maintenance	S	Sampling				
S Records/Reports S	Self-Monitoring I	Program	S Slud	ge Handling/Disposal	N	Pollution Prevention				
U Facility Site Review N	Compliance Sche	dules	N Pret	reatment	N	Multimedia				
Emucitor Receiving waters										
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Name(s) and Signature(s) of Inspector(s) John W. Lamb		Agency/Office/Te Arkansas Departn 3400 West. Hillsb 870-862-0680/ Fa	nent of Enooro, El Do	vironmental Quality orado, AR 71730		Date 05 April 2012				

Agency/Office/Phone and Fax Numbers

Signature of Reviewer

Date

ADEQ Water NPDES Inspection	AFIN: 52-00073	Permit #: AR0022365

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	⊠S □M □U □NA □NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y □N □NA □NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	☑Y □N □NA □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	Øy □n □na □ne
4. ALL DISCHARGES ARE PERMITTED:	Øy □n □na □ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S □M □U □NA □NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☑S ☐M ☐U ☐NA ☐NE
a. DATES AND TIME(S) OF SAMPLING:	☑Y □N □NA □NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y □N □NA □NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	ØY □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	Øy □n □na □ne
e. RESULTS OF CALIBRATIONS:	Øy □n □na □ne
f. RESULTS OF ANALYSES:	Øy □n □na □ne
g. DATES AND TIMES OF ANALYSES:	Øy □n □na □ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	ØY □N □NA □NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	☑S ☐M ☐U ☐NA ☐NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	☑S ☐M ☐U ☐NA ☐NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y □N □NA □NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S □M ☑U □NA □NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	□S □M ☑U □NA □NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	□s □m ☑u □na □ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	⊠s □m □u □na □ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	□S □M ☑U □NA □NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	⊠s □m □u □na □ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	Øy □n □na □ne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	Øy □n □na □ne
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	Øy □n □na □ne
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	Øy □n □na □ne
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	Øy □n □na □ne
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	Øy □n □na □ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□Y ØN □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N □NA ☑NE

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SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	Øy □n □na □ne
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	Øy □n □na □ne
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y □N □NA □NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y □N □NA □NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	Øy □n □na □ne
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	Øy □n □na □ne
a. SAMPLES REFRIGERATED DURING COMPOSITING:	Øy □n □na □ne
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y □N □NA □NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y □N □NA □NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	Øy □n □na □ne
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	•
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: parshall flum.	☑Y □N □NA □NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y □N □NA □NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y □N □NA □NE
4. CALIBRATION FREQUENCY ADEQUATE:	Øy □n □na □ne
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	Øy □n □na □ne
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	□Y □N □NA □NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y □N □NA □NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	Øy □n □na □ne
9. HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	•
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	Øy □n □na □ne
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	□y □n ☑na □ne
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	Øy □n □na □ne
4. QUALITY CONTROL PROCEDURES ADEQUATE:	Øy □n □na □ne
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	Øy □n □na □ne
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y □N □NA □NE
7. COMMERCIAL LABORATORY USED:	Øy □n □na □ne
a. LAB NAME: Environmental Services Inc., Bio-Analytical	
b. LAB ADDRESS: Little Rock, AR, Doyliine, La	
c. PARAMETERS PERFORMED: metals, Bio-monitoring	
8. BIOMONITORING PROCEDURES ADEQUATE:	☑Y □N □NA □NE
a. PROPER ORGANISMS USED:	☑Y □N □NA □NE
b. PROPER DILUTION SERIES FOLLOWED:	Øy □n □na □ne
c. PROPER TEST METHODS AND DURATION:	Øy □n □na □ne
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	Øy □n □na □ne

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BASED ON VISUAL OBSERVATIONS ONLY DETAILS: OUTFALL #: OIL SHEEN									
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5 LIST OF POTENTIAL POLLUTANT SOURCES:									
5. LIST OF POTENTIAL POLLUTANT SOURCES:									
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:									
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:									
8. LIST OF STRUCTURAL BMPS: ØY 🗖 N 🗖 NA C									
9. LIST OF NON-STRUCTURAL BMPS:									
10. BMPS PROPERLY OPERATED AND MAINTAINED:									
11. INSPECTIONS CONDUCTED AS REQUIRED: Main and a line Main a									

FLOW CALCULATION SHEET									
Date: 0	03/14/20	12	Time: 10	:45					
Head in	Inches:	12.00	Feet:	1.0					
Type & S	Size of P	rimary Flo	w Measure	ment Devi	ce: 12" p	arshal	l flum	е	
Name &	Model of	Seconda	ry Flow Me	asuremen	t Device	Pas	savar	nt	
						•			
Data of I	act Calib	ration of S	Secondary F	Flow Dovice	0: 1.19	11			
Date of I	asi Calib	Talloff Of S	becondary r	TIOW DEVIC	e. 4-10-	11			
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DMR Calculation Check

Reporting Period: From 2011 Nov 01 To 2011 Nov 30

Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass	Concentration Monthly				
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l			
Reported Value:	122.63	9.06	11.50			
Calculated Value:	122.63	9.06	11.50			
Permit Value:	538.8	20	30			

If calculated value does not equal reported value, explain:

<u>equal</u>

Water Division NPDES Photographic Evidence Sheet									
Location: City of Camden, Water Utilities									
Photograph	ier:	J	John W. Lamb Witness: None						
Photo #		1	Of	7		Date:	3/14/2012	Time:	9:54
Description: East clarifier with oil leaking gear box									



Photographer: John W. Lamb			. Lamb	Witness:		None		
Photo #	2	Of	7		Date:	3/14/2012	Time:	9:54

Description: Oil sheen floating on east clarifier



Water Division NPDES Photographic Evidence Sheet								
Location:	Location: City of Camden, Water Utilities							
Photographer: John W. Lamb				Witness:	None			
Photo #	3	Of	7		Date:	3/14/2012 Time: 9:59		
Description: West clarifier out of service								



 Photographer:
 John W. Lamb
 Witness:
 None

 Photo #
 4
 Of
 7
 Date:
 3/14/2012
 Time:
 11:01

Description: Solid waste stored onsite and not managed according to SWPPP



Description: Solid waste stored onsite and not managed according to SWPPP



 Photographer:
 John W. Lamb
 Witness:
 None

 Photo #
 6
 Of
 7
 Date:
 3/14/2012
 Time:
 11:02

Description: Solid waste stored onsite and not managed according to SWPPP



Water Division NPDES Photographic Evidence Sheet											
City of Camden, Water Utilities											
Photographer:			John W. Lamb			Witness:	None				
7	Of	7			Date:	3/14/2012	Time:	11:04			
Description:			Tracking at sludge plant, BMPs not adequate								



Photographer:		Witness:						
Of	I	Date:	Time:					
Description:								

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Office 870-836-7331 FAX 870-836-5190

April 12, 2012

Water Division Enforcement Branch Water Division Permits Branch Arkansas Department of Environmental Quality 5301 North Shore Dr. North Little Rock, AR 72118-5317

Re: Compliance Inspection Written Response (NPDES Permit #AR0022365)

Dear Enforcement Section:

The following is Camden Water Utilities response and corrective actions taken to correct the violations noted in Mr. Lamb's routine compliance inspection on March 14, 2012.

Item #1- The west clarifier is having the walls coated and painted and should be

back on-line in about 3 weeks.

Item #2- The east clarifier will be going under a complete over-haul of the gear box

being replaced and the walls being coated and repainted as soon as the

west clarifier goes back on-line."

Item #3- The pallets, carpeting, and scrap that was stored behind the plant has been

removed. The excessive sludge tracking has been cleaned up and will be kept clean in the area. A drainage system is being installed in this area so this area shall be kept clean also. The drain will allow the water to go

back into the head works of the plant to be treated.

If you have any questions concerning this written response of our violations, please feel free to contact me at 870-836-7331.

Sincerely

David Richardson

Manager



LOCK DRAWER J CAMDEN, ARKANSAS 71711

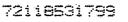
7008 0150 0003 2539 5305



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Arkansas Department of Environmental Quality Water Division Enforcement Branch Water Division Permits Branch 5301 North Shore Drive North Little Rock, AR 72118-5317





April 25th 2012

Mr. David Richardson, Manager City of Camden Water Utilities P.O. Drawer J Camden AR 71711

AFIN: 52-00073 Permit No. AR0022365

RE: Response to Inspection

Dear Mr. Richardson:

I have reviewed the response pertaining to the March 14th 2012 inspection of the above referenced facility. The information provided appears to sufficiently address the violations referenced in the inspection report. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0631 or you may e-mail me at johnsonm@adeq.state.ar.us.

Sincerely,

Hiladhus

Miles Johnson Enforcement Branch Water Division